



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 09 1991

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REF: 4WD-SSRB

James C. Brown
Manager, Environmental Affairs
Department
Olin Chemicals
Post Office Box 248
Charleston, Tennessee 37310

YELLOW

RE: Olin Corp./McIntosh Superfund Site
Revised Work Plan, Sampling & Analysis Plan (Vols. I & II),
and Health & Safety Plan

Dear Mr. Brown:

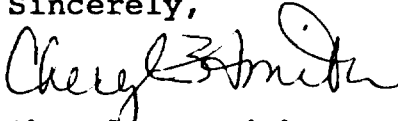
This letter is in response to our August 6, 1991 technical meeting held at the Olin Corp./McIntosh superfund site. The comments to follow are a result of additional comments that were provided by other members of the EPA peer review panel as well as a more detailed review of historical data and associated guidance documents.

Generally, contaminant plume migration must be identified. EPA is sensitive to your concerns for addressing possible contamination of the Tombigbee River and the approach of how to identify Olin's contributions versus contaminants present from other sources. Because the sources of contamination and processes by which Olin produced these contaminants are likely to be different from those contributed from other sources, it is likely that the chemical composition of contaminants from Olin, as they appear in the environment, can be distinguished from those produced by other sources. These "signature compounds" could allow Olin a mechanism for tracking those contaminants that are unique to Olin. This could also provide a mechanism for ascertaining any additional potentially responsible parties (PRPs).

The Remedial Investigation/Feasibility Study (RI/FS) process is extremely dynamic. This process was designed to determine the extent of contamination. As data is obtained, additional modifications/amendments to the Work Plan and associated documents may be required to assure that adequate information is obtained to make an informed decision for selecting the appropriate technology that will mitigate and reduce further migration of the contaminants of concern.

If there are any questions regarding the enclosed comments, please feel free to give me a call at (404)347-2643. I would appreciate a written response to these comments on or before COB on August 26, 1991. In addition, please provide revisions of the pages affected by these comments.

Sincerely,



Cheryl W. Smith
Remedial Project Manager
South Superfund Remedial Branch

cc: Toni Odom, Olin
Joe Downey, ADEM

Enclosure

YELLOW

CSMITH/REVWP.WP/OLIN DISK/8-9-91/EXT. 2643

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MESSAGE CONFIRMATION

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